

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin Y. Teruya (Bar No. 235916)
 kevinteruya@quinnemanuel.com
 865 South Figueroa Street, 10th Floor
 Los Angeles, CA 90017-2543
 (213) 443-3000

HAGENS BERMAN SOBOL SHAPIRO LLP

Shana E. Scarlett (Bar No. 217895)
 shanas@hbsslaw.com
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 (510) 725-3000

Interim Co-Lead Consumer Class Counsel

BATHAE DUNNE LLP

Yavar Bathaee (Bar No. 282388)
 yavar@bathaeedunne.com
 445 Park Avenue, 9th Floor
 New York, NY 10022
 (332) 322-8835

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Amanda F. Lawrence (*pro hac vice*)
 alawrence@scott-scott.com
 156 South Main Street, P.O. Box 192
 Colchester, CT 06415
 (860) 537-5537

Interim Co-Lead Advertiser Class Counsel

[Additional counsel listed on signature page]

WILMER CUTLER PICKERING

HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)
 Sonal.Mehta@wilmerhale.com
 2600 El Camino Real, Suite 400
 Palo Alto, California 94306
 Telephone: (650) 858-6000
 Facsimile: (650) 858-6100

DAVID Z. GRINGER (*pro hac vice*)

David.Gringer@wilmerhale.com
 7 World Trade Center
 250 Greenwich Street
 New York, New York 10007
 Telephone: (212) 230-8800
 Facsimile: (212) 230-8888

ARI HOLTZBLATT (*pro hac vice*)

Ari.Holtzblatt@wilmerhale.com
 MOLLY M. JENNINGS (*pro hac vice*)
 Molly.Jennings@wilmerhale.com
 2100 Pennsylvania Ave NW
 Washington, DC 20037
 Telephone: (202) 663-6000
 Facsimile: (202) 663-6363

Attorneys for Defendant Meta Platforms, Inc.

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
 themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
 Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

STIPULATED ~~[PROPOSED]~~ ORDER
MODIFYING SEALING PROCEDURES
RELATING TO DISPOSITIVE
MOTIONS AND MERITS *DAUBERT*
BRIEFING

Judge: Hon. James Donato

1 WHEREAS, this Court's November 18, 2022 Amended Scheduling Order set a schedule
2 for briefing associated with dispositive motions and merits *Daubert* motions. As set forth in the
3 scheduling order, the last date to file dispositive motions and merits *Daubert* motions is April 5,
4 2024, and briefing is scheduled to be complete on those motions on May 21, 2024. The scheduling
5 order also calls for the parties to file, on May 28, 2024, a joint submission for the merits concurrent
6 expert proceeding. Dkt. 379.

7 WHEREAS, the parties anticipate that briefing on any dispositive motions and merits
8 *Daubert* motions and the joint submission for the merits concurrent expert proceeding would
9 involve "voluminous or multiple administrative motions to seal ... if normal procedures were
10 followed," including motions to consider whether multiple non-parties' information should be
11 sealed. Accordingly, the parties believe that these filings are subject to the procedure set forth in
12 Paragraph 31 of the Court's Standing Order for Civil Cases, which calls for the filing of a single
13 combined administrative motion to seal covering all unopposed sealing requests, and a single
14 combined administrative motion to seal covering all opposed requests, following the completion
15 of briefing ("Omnibus Sealing Motions").

16 WHEREAS, given that pursuant to Paragraph 31, the Omnibus Sealing Motions will
17 supersede any interim sealing motions that would ordinarily accompany the parties' opening
18 briefs, opposition briefs, reply briefs, and the joint submission for the merits concurrent expert
19 proceeding, the parties believe it will be most efficient for the Court, the parties, and any implicated
20 non-parties to handle all sealing issues in Omnibus Sealing Motions to be filed following the filing
21 of these materials.

22 WHEREAS, the parties have conferred and jointly propose, subject to the Court's approval,
23 certain modifications to this Court's procedures for sealing of filings associated with dispositive
24 motion briefing, merits *Daubert* briefing, and the joint submission for the merits concurrent expert
25 proceeding, for efficiency and to reduce burden on the Court, the parties, and any implicated non-
26 parties. The parties are mindful of the Court's instructions that sealing requests should be few,
27 narrowly tailored, and well-supported. See Dkt. 344.

28 WHEREAS, this Court previously approved similar modifications to its sealing procedures

1 for the parties' briefing on motions for class certification and related *Daubert* motions, Dkt. 656,
 2 and the parties understand that this Court has approved similar modifications to its sealing
 3 procedures in other similar contexts, *In re Google Play Store Antitrust Litig.*, 3:21-md-02981-JD,
 4 Dkts. 246, 256, 496 (N.D. Cal.).

5 NOW, THEREFORE, IT IS STIPULATED AND AGREED SUBJECT TO THE
 6 COURT'S APPROVAL:

- 7 • The parties shall file redacted versions of dispositive motions briefing, merits
 8 *Daubert* briefing, and the joint submission for the merits concurrent expert
 9 proceeding, as separate entries on the ECF docket; and
- 10 • The parties shall also contemporaneously file unredacted copies of all documents
 11 on the ECF docket provisionally under seal, along with a one-page interim sealing
 12 motion which may indicate that the reasons for sealing will be discussed in a
 13 forthcoming Omnibus Sealing Motion; and
- 14 • The parties and any non-parties shall jointly file Omnibus Sealing Motions
 15 covering the dispositive motions briefing, merits *Daubert* briefing, and the joint
 16 submission for the merits concurrent expert proceeding 30 days after the last of
 17 these documents is filed;
- 18 • For briefing on other motions or other filings not referenced in this stipulation that
 19 the parties anticipate would involve voluminous or multiple administrative motions
 20 to seal if normal procedures were followed, the parties may agree to use the sealing
 21 procedure set out in this stipulation without seeking further authorization from the
 22 Court. For such filings, the parties shall file redacted versions of the relevant
 23 documents as separate entries on the ECF docket; contemporaneously file
 24 unredacted copies of all documents on the ECF docket provisionally under seal,
 25 along with a one-page interim sealing motion which may indicate that the reasons
 26 for sealing will be discussed in a forthcoming Omnibus Sealing Motion; and the
 27 parties and any non-parties shall jointly file Omnibus Sealing Motions covering
 28 such filings 30 days after the last document associated with the relevant motion or

1 other filing is filed.

2
3 **IT IS SO STIPULATED.**

DATED: March 25, 2024

Respectfully submitted,

By: /s/ Shana E. Scarlett
HAGENS BERMAN SOBOL SHAPIRO LLP
Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000

Steve W. Berman (*pro hac vice*)
steve@hbsslaw.com
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

W. Joseph Bruckner (*pro hac vice*)
wjbruckner@locklaw.com
Robert K. Shelquist (*pro hac vice*)
rkshelquist@locklaw.com
Brian D. Clark (*pro hac vice*)
bdclark@locklaw.com
Rebecca A. Peterson (Bar No. 241858)
rapeterson@locklaw.com
Arielle S. Wagner (*pro hac vice*)
aswagner@locklaw.com
Kyle J. Pozan (admitted *pro hac vice*)
kjpozan@locklaw.com
Laura M. Matson (admitted *pro hac vice*)
lmmatson@locklaw.com
100 Washington Avenue South, Suite
2200
Minneapolis, MN 55401
Telephone: (612) 339-6900

By: /s/ Kevin Y. Teruya
**QUINN EMANUEL URQUHART & SULLIVAN,
LLP**

Kevin Y. Teruya (Bar No. 235916)
kevinteruya@quinnemanuel.com
Adam B. Wolfson (Bar No. 262125)
adamwolfson@quinnemanuel.com
Claire D. Hausman (Bar No. 282091)
clairehausman@quinnemanuel.com
Brantley I. Pepperman (Bar No. 322057)
brantleypepperman@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
(213) 443-3000

Michelle Schmit
michelleschmit@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)
manishasheth@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000

Interim Counsel for the Consumer Class

By: /s/ Yavar Bathaee
BATHAEE DUNNE LLP
Yavar Bathaee (Bar No. 282388)
yavar@bathaeedunne.com
Andrew C. Wolinsky (*pro hac vice*)
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Telephone: (332) 322-8835

Brian J. Dunne (Bar No. 275689)
bdunne@bathaeedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
901 South MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Telephone: (512) 575-8848

AHDOOT & WOLFSON, PC
Tina Wolfson (Bar No. 174806)
twolfson@ahdootwolfson.com
Robert Ahdoot (Bar No. 172098)
rahdoot@ahdootwolfson.com
Theodore W. Maya (Bar No. 223242)
tmaya@ahdootwolfson.com
Henry Kelston (*pro hac vice*)
hkelston@ahdootwolfson.com
2600 West Olive Avenue, Suite 500
Burbank, CA 91505
Telephone: (310) 474-9111

By: /s/ Amanda F. Lawrence
**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**
Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Telephone: (860) 537-5537

Hal D. Cunningham (Bar No. 243048)
hcunningham@scott-scott.com
Daniel J. Brockwell (Bar No. 335983)
dbrockwell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 233-4565

Patrick J. Rodriguez (*pro hac vice*)
prodriguez@scott-scott.com
230 Park Avenue, 17th Floor
New York, NY 10169
Telephone: (212) 223-6444

LEVIN SEDRAN & BERMAN LLP
Keith J. Verrier (*pro hac vice*)
kverrier@lfsblaw.com
Austin B. Cohen (*pro hac vice*)
acohen@lfsblaw.com
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500

Interim Counsel for the Advertiser Class

By: /s/ Sonal N. Mehta

SONAL N. MEHTA (SBN 222086)
Sonal.Mehta@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, California 94306
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
ROSS E. FIRSENBAUM (*pro hac vice*)
Ross.Firsenbaum@wilmerhale.com
RYAN CHABOT (*pro hac vice*)
Ryan.Chabot@wilmerhale.com
PAUL VANDERSLICE (*pro hac vice*)
Paul.Vanderslice@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800

ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
Molly.Jennings@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037
Telephone: (202) 663-6000

MICHAELA P. SEWALL (*pro hac vice*)
Michaela.Sewall@wilmerhale.com
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000

Attorneys for Defendant Meta Platforms, Inc.

SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 25, 2024



JAMES DONATO
United States District Judge